

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: APPLICATION OF OMAR  
ALGHANIM FOR AN ORDER TO  
TAKE EXPEDITED DISCOVERY  
FOR USE IN FOREIGN  
PROCEEDING PURSUANT TO 28  
U.S.C. § 1782

Misc. Action No.:

**APPLICATION OF OMAR ALGHANIM FOR AN ORDER  
TO TAKE EXPEDITED DISCOVERY FOR USE IN FOREIGN PROCEEDING  
PURSUANT TO 28 U.S.C. § 1782**

Petitioner Omar Alghanim, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 30, 34, and 45, respectfully applies to this Court for an order in the form attached as Exhibit 3 to the Declaration of Robert Van Kirk (the “Van Kirk Declaration”) filed February 1, 2021, authorizing Petitioners to take discovery for use in pending proceedings before the Commercial Court of Kuwait in the form of the subpoenas attached as Exhibit 4 to the Van Kirk Declaration. In support of this petition, Petitioner submits a Memorandum of Law and attaches the Van Kirk Declaration, the Declaration of Bader El Jeaan, and the Declaration of Omar Alghanim.

Dated: February 1, 2021

WILLIAMS & CONNOLLY LLP

/s/ Robert Van Kirk  
Robert Van Kirk (*pro hac vice forthcoming*)  
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